

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Case No. 13-53846

City of Detroit, Michigan,

Judge Thomas J. Tucker

Debtor.

Chapter 9

B & C Land Development Corporation,

Appellant,

-vs-

The City of Detroit,

Appellee.

Statement of Issues on Appeal

B & C Land Development Corporation, by counsel hereby states the issues presented on appeal to the United States District Court for the Eastern District of Michigan from the Order Granting of Detroit's Motion for Entry Of An Order (I) Enforcing the Plan of Adjustment Injunction and (II) Requiring B&C Land Development Corporation to (A) Dismiss with Prejudice Its State Court Lawsuit and (B) Withdraw Its Notice of Lis Pendens.

1. Whether the Bankruptcy Court erred in ruling that the offer to purchase entered into between B&C Land Development Corporation and the City of Detroit is not a valid and enforceable contract under Michigan Law.
2. Whether the Bankruptcy Court erred in ruling that the offer to purchase is not an executory contract in the Chapter 9 Bankruptcy case within the meaning of Section 365 of the Bankruptcy Code.

3. Whether the Bankruptcy Court erred in ruling that the offer to purchase was not an executory contract that survived the bankruptcy, bankruptcy discharge and the injunction.
4. Whether the Bankruptcy Court erred in ruling that B&C Land Development Corporation did not have any claims against the City of Detroit that survived the Bankruptcy discharge and confirmation of the plan of adjustment.

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Dated: September 3, 2015

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 3, 2015, B&C Land Development Corporation's Statement of Issues on Appeal was filed and served via the Court's electronic case filing and notice system and served on counsel listed below through the system:

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Dated: September 3, 2015

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